

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

CHRISTOPHER LACCINOLE,
Plaintiff,

v.

INTERNATIONAL UNION OF POLICE
ASSOCIATION AFL-CIO and DOES 1-10,
inclusive,
Defendants.

Case 1:21-cv-00240

**INTERNATIONAL UNION OF POLICE ASSOCIATION AFL-CIO'S
ANSWER TO PLAINTIFF'S COMPLAINT**

Defendant, International Union Of Police Association AFL-CIO ("IUPA" or "Defendant") answers the enumerated paragraphs of the Plaintiff's Complaint as follows:

INTRODUCTION

The introductory paragraph contains nothing but scurrilous allegations and opinion. No response is required but, to the extent a response is required, it is denied.

1. This paragraph contains a truism and no response is required. To the extent a response is required, it is denied.

2. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

3. This paragraph contains a truism and no response is required. To the extent a response is required, it is denied.

4. Denied.

II. JURISDICTION AND VENUE

5. This paragraph calls for a legal conclusion and, therefore, does not require a response. To the extent a response is required, it is denied.

6. This paragraph calls for a legal conclusion and, therefore, does not require a response. To the extent a response is required, it is denied.

III. PARTIES

7. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

8. Admitted.

9. Admitted.

10. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

11. Admitted.

12. Admitted.

IV. FACTUAL ALLEGATIONS

13. Denied.

14. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

15. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

16. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

17. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

27. Denied.

28. Denied.

29. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

30. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

31. Defendant lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

32. Denied.

33. Admitted.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Denied.

42. This paragraph calls for a legal conclusion and, therefore, does not require a response. To the extent a response is required, it is denied.

V. STATUTORY STRUCTURE TELEPHONE CONSUMER PROTECTION ACT

43. This paragraph calls for a legal conclusion and, therefore, does not require a response. To the extent a response is required, it is denied.

44. This paragraph calls for a legal conclusion and, therefore, does not require a response. To the extent a response is required, it is denied.

45. This paragraph calls for a legal conclusion and, therefore, does not require a response. To the extent a response is required, it is denied.

46. This paragraph calls for a legal conclusion and, therefore, does not require a response. To the extent a response is required, it is denied.

47. This paragraph calls for a legal conclusion and, therefore, does not require a response. To the extent a response is required, it is denied.

VI. STATUTORY STRUCTURE RIGHT TO PRIVACY

48. This paragraph calls for a legal conclusion and, therefore, does not require a response. To the extent a response is required, it is denied.

COUNT I – Telephone Consumer Protection Act – 47 U.S.C. § 227(b)(3)

49. Denied.

50. Denied.

51. Denied.

52. PAC lacks sufficient information or belief to either admit or deny the allegations of this paragraph.

COUNT II – Telephone Consumer Protection Act – 47 U.S.C. § 227(c)(5)

53. Denied.

54. Denied.

55. Denied.

56. Denied.

COUNT III – RIGHT TO PRIVACY

57. Denied.

58. Denied.

59. Denied.

60. Denied.

61. Denied.

62. Denied.

WHEREFORE, IUPA demands judgment enter in its favor and against the Plaintiff with respect to all claims directed against it, that it be awarded its attorneys' fees and costs, and such other relief as the Court deems proper.

JURY DEMAND

IUPA demands trial by jury on all issues so triable.

AFFIRMATIVE DEFENSES

1. Plaintiff fails to state a claim upon which relief may be granted.
2. The actions complained of by the Plaintiff were made by others over whom the Defendant had no direction or control.

**INTERNATIONAL UNION OF POLICE
ASSOCIATION AFL-CIO**

By Its Attorneys

/s/ Brian C. Newberry

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Dated: June 11, 2021

CERTIFICATE OF SERVICE

I certify that on this 11th day of June, 2021, I filed the within document through the Electronic Filing System and caused a true copy of this document to be served via electronic mail upon counsel of record:

Christopher M. Laccinole 17 Richard Smith Road Narragansett, RI 02882 chrislaccinole@gmail.com <i>Pro Se Plaintiff</i>	
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/s/ Brian C. Newberry